

TAHOE REGIONAL PLANNING AGENCY

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December 7, 2006

Tam Doduc
Board Chair
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814



**RE: Tahoe Regional Planning Agency (TRPA) Comments on
SWRCB/DWR Draft Funding Recommendations**

Dear Ms. Doduc:

Thank you for the opportunity to comment on the State Water Resources Control Board (SWRCB) and Department of Water Resources (DWR) Draft Funding Recommendations for allocation of Integrated Regional Water Management Program (IRWMP) implementation grant funds. The TRPA, as part of the Tahoe Sierra Group led by the Tahoe Resource Conservation District, would like to offer the following three comments.

- 1 As we understand from attending the Public Hearing on this program held November 16, 2006, there are approximately \$180 million remaining grant funds under Proposition 50. In addition, there is approximately \$1 billion more for the IRWM Grant Program from the recently approved Proposition 84. Due to the lengthy, expensive and arduous process of applying for IRWMP grant funds, TRPA suggests that DWR and SWRCB award the remaining nine grant applications from the 2006 grant cycle with the \$180 million still remaining in Proposition 50. This would benefit the state in the following ways:

The critical capital improvement and water quality projects the remaining nine applicants have designed would not be forced to wait for another funding cycle. Immediately awarding the funds for applications that have already been reviewed would benefit the residents of the respective jurisdictions and meet the intent of Proposition 50 to improve statewide water infrastructure in a timely manner.

The IWRMP grant application process designed by DWR and SWRCB was an extremely expensive and time consuming process, placing significant staffing and budgetary burdens upon those agencies applying for funds. The agencies involved in applying for this most recent IRWMP

cycle dedicated extensive fiscal, administrative and public works staff time in the preparation of the application, all at taxpayer expense. We believe DWR and SWRCB also dedicated substantial staff time in the review and commenting of these applications. Rather than duplicate the application and review process, expending more public dollars and valuable time, TRPA encourages SWRCB and DWR to recognize the substantial investment already made and fund those applications they have in hand.

As was made clear at the November 16th public hearing in Sacramento, many regional partnerships have received planning funds from the IRWMP grant, but have not yet prepared an implementation grant. By funding the remaining nine Step 2 applicants now, those jurisdictions still struggling to develop project applications would be granted additional time to formulate competitive proposals and receive funds under Proposition 84.

2. After reviewing the draft funding list, the TRPA noticed that \$150 million of the \$175 million Proposition 50 funds awarded were allocated to metropolitan cities and counties primarily around Los Angeles and the Bay Delta. While we recognize these highly populated areas qualify as Statewide Priorities due to their extreme water quality supply and infrastructure needs, both areas received “earmarks” from Proposition 50 and Proposition 84. The IWRMP funding was one of the few sections within Proposition 50 that allowed for competitive funding on a statewide basis. We believe that Proposition 50 and 84 funding commitments would be more equitable if they were dispersed throughout the state.
3. Finally, the Step 1 and Step 2 IRWMP application processes were very extensive in their requirements, necessitating a substantial investment in staff hours and resources. To compensate, many applicants hired outside consultants to alleviate the heavy work burden and designate a full-time lead manager to direct, organize, and prepare their proposals. We believe that in the development of the application process, an unintended consequence was created where partnerships having financial resources available to commit to outside assistance gained a competitive advantage. (For instance, all of proposals recommended for this round of Prop 50 funding were prepared by outside consultants). If this type of application process were to continue, smaller partnerships and/or rural partnerships would continue to be put at a disadvantage, regardless of the strength of their collection of projects, simply due to the inability of in-house staff to commit hours and resources comparable with those of larger and better-funded partnerships. For future funding rounds, we would support a more streamlined and direct application process, similar to that designed for the Consolidated Grants Program, to allow small and/or rural partnerships to compete on a more level playing field.

TRPA urges staff at DWR and SWRCB to seriously consider the recommendations contained herein. We look forward to your decision.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Singlaub", with a large, sweeping flourish at the end.

John Singlaub
Executive Director
Tahoe Regional Planning Agency

Cc: Tracie Billington